Middlebury College
Personal Protective Equipment (PPE) Policy

Revision Date: 2/1/2018
For the most current revision, refer to the Middlebury College Environmental Health and Safety webpage (go/ehs under Policies & Procedures).

1.0 Scope

The purpose of this policy is to define the basic elements and responsibilities to ensure the safe use of personal protective equipment (PPE) on campus in compliance with Occupational Safety and Health Standards (OSHA) 29 CFR 1910 Subpart I Personal Protective Equipment. This policy applies to all locations or projects where PPE is required at Middlebury College.

PPE is any equipment or clothing designed to create a barrier to protect a person from chemical, medical waste, physical, or mechanical hazard. PPE includes, but is not limited to: chemical goggles, safety glasses with permanent side shields, face shields, gloves, chemical aprons, proper footwear, respirators, chemical boots, hearing protection devices, and hard hats.

2.0 Responsibilities

Environmental Health and Safety Office (EHS)
1) Maintain the written program. Ensure that PPE is being properly selected, used, and maintained.
2) Assist management in ensuring that proper PPE is used based on the specific hazard of the operation(s) being conducted.
3) Conduct PPE assessment and training as needed.
4) Approve PPE on behalf of Middlebury College and manage reimbursements where applicable.

Supervisors
1) Ensure that proper PPE is used based on the specific hazard of the operation(s) being conducted.
2) Ensure employees use PPE only when they are trained to do so and in a manner consistent with the requirements of this written PPE Policy and any associated training.
3) Maintain knowledge and skills in order to ensure that PPE is used properly, safely, and according to the requirements of this policy.
4) Only approved PPE may be used by Middlebury College personnel. All equipment must meet OSHA, ANSI or other appropriate authorities recognized by OSHA (VOSHA).
5) Ensure that PPE is properly maintained or replaced as required.
Conduct periodic audits of PPE usage to ensure that it is being properly used and maintained.

Employees

1) Comply with all aspects of this written policy.
2) Use PPE only in accordance with instruction and training received.
3) Perform tasks requiring the use of PPE only when such equipment is available and in usable condition.
4) Only use PPE that is clean and in good condition. Report problems with PPE to your supervisor.
5) Only use PPE issued and approved by your supervisor for the specific job. When not in use, store PPE in a clean and sanitary condition. Maintain and/or replace PPE, as required.

Contractors

1) If predetermined in contract terms and conditions, contract employees shall be permitted to be issued and use PPE supplied by Middlebury College, otherwise they must provide their own PPE.
2) Ensure that contractor employees are properly trained and using PPE required for the job.

3.0 Policy

General Requirements

1) All hazard areas shall be posted. Postings shall readily identify the particular work station, area, or process involved and the type of PPE required.
2) PPE shall be utilized for the designated area or for a designated procedure within an area.
3) Each piece of PPE should be inspected immediately upon removal from the package. Determine if PPE is that which was ordered and/or specified for the task. Visually inspect PPE for defects.
4) The user of the PPE shall inspect PPE to be worn immediately before donning. The wearer should be trained in and understand all aspects of the equipment’s operation and limitation.
5) During the course of the work task, each worker should be aware of the condition and periodically inspect their PPE. Any item that has been physically damaged or chemically degraded should be removed and replaced.
6) The principal objective of the doffing process is to restrict the transfer of chemical, biohazards or other contaminant from the work area. Avoid contact with a person doffing a garment as well with others with hazardous substances on the outside of their garments.
7) Surface contamination may be removed by washing/cleaning the PPE. This is dependent upon the particular chemical or contaminant involved. Equipment should be cleaned prior to storage. PPE should be stored in a clean and accessible area, away from other equipment. Disposable PPE shall be disposed of in a manner consistent with the type and degree of contamination involved.
8) Required PPE shall meet the following minimum requirements:
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a. Provide adequate protection against the particular hazard for which it is selected.
b. Fit properly and not unduly interfere with the movement or comfort of the wearer.
c. Be durable and be capable of being disinfected and cleaned or be disposable.
d. Meet applicable performance and design criteria of ANSI and/or other applicable agencies.
e. Be kept clean and in good repair and stored away from contaminates.

Eye and Face Protection

1) Employees must wear appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation.

2) Where face shields are required, they shall always be worn with safety glasses or chemical goggles. Face shields shall be mandatory for the transfer or pouring of chemicals, disposal of chemical hazardous waste, or any other operation where there is the potential for splashes to the face (blood or biohazardous contamination).

3) Protective eye and face protection devices must comply with any of the following consensus standards:
   a. ANSI/ISEA Z87.1-2010, Occupational and Educational Personal Eye and Face Protection Devices,
   b. ANSI Z87.1-2003, Occupational and Educational Personal Eye and Face Protection Devices, or

Hand Protection

1) Employees must use appropriate hand protection when hands are exposed to hazards such as those from skin absorption of harmful substances; severe cuts or lacerations; severe abrasions; punctures; chemical burns; thermal burns; and harmful temperature extremes.

2) Verify the appropriate glove if chemicals are being used. The Safety Data Sheet (SDS) should be checked to ensure compatibility with the chemicals being handled.

Foot Protection

1) Employees must use protective footwear when working in areas where there is a danger of foot injuries due to falling or rolling objects, or objects piercing the sole, or when the use of protective footwear will protect the affected employee from an electrical hazard, such as a static-discharge or electric-shock hazard, that remains after the employer takes other necessary protective measures.

2) Protective footwear must comply with any of the following consensus standards:
   b. ANSI Z41-1999, American National Standard for Personal Protection -- Protective Footwear, or

3) Employees that cannot wear safety footwear for medical reasons must provide a letter from their medical provider stating the reason they cannot wear the safety footwear. Other suitable footwear would then be determined by the supervisor and/or EHS. For example, a heavy duty leather work boot or shoe. It may also be necessary to excuse the employee from performing any potentially dangerous job requiring safety shoes. This would be determined by the supervisor and/or EHS.

Head Protection

1) Employees must wear a protective helmet when working in areas where there is a potential for injury to the head from falling objects.
2) A protective helmet designed to reduce electrical shock hazard must be worn by employees when near exposed electrical conductors which could contact the head.
3) Head protection must comply with any of the following consensus standards:
   a. American National Standards Institute (ANSI) Z89.1-2009, American National Standard for Industrial Head Protection,
   b. American National Standards Institute (ANSI) Z89.1-2003, American National Standard for Industrial Head Protection, or

Purchase of PPE

1) The College shall make the specified PPE available at no cost to employees who require it, with the exception of safety shoes and prescription eyewear. The College may reimburse the employee for a portion of the purchase of safety shoes and prescription eyewear.
2) Prescription safety glasses may be fully or partially reimbursable depending on a number of factors. If reimbursement is approved by the supervisor and EHS, the employee would be required to use a College approved vendor for the purchase. The fixed side shields may not be removed.
3) Employees required to wear protective footwear may be reimbursed by the EHS Office up to $75.00 per pair on an annual basis.
   a. Employees that work outside may be approved by their supervisor and EHS to receive reimbursement for a winter steel toed boot in addition to a warm weather shoe.
   b. An employee may be reimbursed when their safety shoes are no longer safe to wear or require replacement, with approval from the supervisor and EHS.
   c. Protective footwear must meet the standard described in the Foot Protection section of this policy for reimbursement to be approved.
   d. Original receipts with the employee name and College ID number must be presented to the EHS Office for reimbursement to occur.